

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

DOMINIC GRECO,

Plaintiff,

Case No. 14-
Hon.

v.

DETROIT ENTERTAINMENT, LLC, d/b/a
Motor City Casino,

Defendant.

ERIC STEMPIEN (P58703)
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COMPLAINT AND JURY DEMAND

Plaintiff, Dominic Greco, by and through his attorneys, Romano Law, PLLC, hereby complains against Defendant Detroit Entertainment, LLC, and in support thereof states:

JURISDICTION AND PARTIES

1. Plaintiff Dominic Greco (hereinafter “Greco”) is a resident of the Township of Clinton, Macomb County, Michigan.
2. Defendant Detroit Entertainment, LLC is a Michigan limited liability company that does business under the assumed name of Motor City Casino (hereinafter “Motor City”).
3. Jurisdiction is vested upon this Court pursuant to 28 USC §1331 because this matter involves a federal question.

4. The transaction or occurrence alleged in this Complaint arose in the City of Detroit, Wayne County, Michigan. Venue lies in the Eastern District of Michigan.
5. Greco has been employed in the casino operations department of Motor City as a table games dealer since August 2004.
6. Throughout the course of his employment, Greco has been subjected to harassment on the basis of his race.

COUNT I – RACE HARASSMENT IN VIOLATION OF TITLE VII

7. Plaintiff hereby incorporates by reference all previous paragraphs of this Complaint as if fully set forth herein.
8. Greco is a member of a protected class based on his race.
9. Greco has been subjected to unwelcome racial harassment during the course of his employment with Motor City.
10. The harassment that Greco suffered was intended to, and did in fact, interfere with his work performance.
11. The harassment suffered by Greco created an offensive, intimidating and hostile work environment for him at Motor City.
12. Greco complained to supervisors and managers at Motor City about the racial harassment and Motor City failed to take prompt remedial action to end the harassment.
13. The harassment suffered by Greco was based on his race.
14. Greco was subjected to constant, repeated and pervasive racial epithets.
15. Motor City tolerated, condoned and encouraged the racial epithets and racial harassment suffered by Greco.

16. As a direct and proximate result of Motor City's violation of Title VII, Plaintiff has suffered damages, including, but not limited to: lost past and future wages, lost past and future employment benefits and severe emotional distress.

WHEREFORE, Plaintiff Dominic Greco prays that this Honorable Court enter a judgment against Defendant Detroit Entertainment LLC in an amount that this Court deems fair and just, plus costs, interest and attorney fees wrongfully incurred.

JURY DEMAND

Plaintiff Dominic Greco hereby demands a trial by jury.

ROMANO LAW, PLLC

/s/ Eric Stempien
By: Eric Stempien (P58703)
Attorney for Plaintiff

Dated: August 11, 2014